

EXHIBIT 64

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

1 Pursuant to 28 U.S.C. § 1746(2), I, Camilla Glatt, hereby declare as follows:

- 2 1. I am over the age of eighteen and competent to testify herein.
- 3
- 4 2. I am employed at Columbia Basin College. My job title is Vice President for Human
Resources & Legal Affairs. My job description is attached as Document No. 1.
- 5 3. There is at least 1 employee at Columbia Basin College who is a recipient of Deferred
6 Action for Childhood Arrivals (DACA).
- 7 4. The DACA recipient is employed as an Outreach & Retention Specialist. That employee's
8 job description is attached as Document No. 2. The employee serves students in the Cyber
Security Program and others in an effort to meet the mission of the College.
- 9 5. Columbia Basin College spends time and resources to recruit, hire, train, and supervise
10 employees. When any employee departs, it creates disruption for our agency and costs us
time and resources to replace and train that person.
- 11 6. The termination of DACA will be disruptive to operations and cause us to expend additional
12 resources.

13 I declare under penalty of perjury that the foregoing is true and correct.

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15 Executed on this 1st day of September, 2017

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17 _____
18 Camilla Glatt
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JOB DESCRIPTION

Employee Name:	Camilla Glatt
Job Title:	Vice President for Human Resources & Legal Affairs
Reports to:	President
Exempt/FLSA	Yes
Prepared Date:	August 20, 2007
Approved Date:	February 19, 2008

A POSITION OBJECTIVES

The Vice President for Human Resources & Legal Affairs will direct and coordinate all aspects of Human Resources, Labor Relations and Legal Affairs including recruitment, benefits, leaves, compensation, contracts, classification, employee development and training, faculty and classified bargaining, diversity initiatives, discrimination and harassment complaints, and disciplinary actions. Additionally, the position is responsible for the College's legal practices, preparation of written opinions and guidance for college management in regards to grievances, complaints and lawsuits.

The Vice President for Human Resources & Legal Affairs is responsible for coordination and implementation of strategic Human Resources, Labor Relations and Legal Affairs functions. This position plays a key role in advancing the relationships between the institution and the two collective bargaining groups (faculty and classified staff) that are integral to the success of the College's mission and goals.

This is a contracted, exempt management position that reports to the College President.

B SUPERVISORY RESPONSIBILITIES

Yes

C ESSENTIAL FUNCTIONS – DUTIES AND RESPONSIBILITIES

- Develop, recommend and carry out approved personnel/human resources programs in support of the strategic goals identified by the Board of Trustees and the President;
- Review, develop and recommend College policies and procedures and assure consistency/compliance with state and federal regulations; maintain the College's policy Operations Manual and assure of compliance with the Washington Administrative Code;
- Design and execute strategies for the administration and communication of HR law, regulations, and policies as well as industry trends, best practices, and operating guidelines for existing and new developments of the College;
- Serve as the College's primary human resource interface with the Washington State Office of the Attorney General;
- Advise the President and the Board of Trustees, in conjunction with the Assigned Assistant Attorney General, on all personnel

and legal matters concerning the College;

- Serve as the College's Title IX Coordinator assuming all responsibility for leadership, coordination and oversight of the College's Non-Discrimination & Harassment Policy & Grievance Procedure assuring compliance with Title IX of the Educational Amendments Act of 1972;
- Serve as the Affirmative Action Officer, Public Records Officer, and Appointing Authority for Classified Staff Personnel;
- Serve as the lead member of the CBC negotiation team during contract negotiations and promote effective labor/management relations;
- Work in collaboration with CBC managers, investigate and recommend employee disciplinary action consistent with CBC policies, procedures and appropriate collective bargaining agreement(s);
- Research information to develop and implement Board policies or human resource policies and procedures to guide the daily operations of the College;
- Interact with administrators, supervisors and employees to assess department/division human resource needs including, but not limited to, organizational structures, staffing, configurations and organizational development;
- Responsible for the overall coordination and implementation of programs related to the College's Equal Opportunity and Affirmative Action Program including development of the plan, identification of problem areas and assisting in arriving at solutions, serving as liaison between the College and enforcement agencies and community organizations, and providing training to staff to prevent disparate and/or harassment of employees or students who are members of affected groups;
- Coordinate the administration of all salary programs, including application of the provisions of the faculty negotiated agreement, compliance with the Washington State Department of Personnel Classified Staff Salary Schedule guidelines; implementation of the administrative/exempt compensation plan and administration of the hourly pay program;
- Coordinate all aspects of recruitment activities for academic, administrative and classified positions, including implementation of strategies to achieve affirmative action and diversity objectives and goals;
- Serve on College committees and provide leadership to College committees as may be designated by the President; act as the College's liaison to external agencies and organizations regarding human resource matters (i.e. State Board for Community and Technical Colleges, Washington State Department of Personnel, Department of Labor and Industries, Department of Employment Security, Human Rights Commission and other organizations);
- Lead, participate in, or coordinate projects, committees or task

forces as assigned by the President;

- Discharge other administrative assignments, as directed by the President; and
- Fulfill other duties as assigned.

Common Duties Established by the College

1. Serve as a member of the designated College committees, councils, and teams; serve on President's Cabinet;
2. Provide leadership in accordance with the Mission, Vision, and Values established by the College, furthering goals and strategic initiatives;
3. Ensure areas of responsibility operate effectively within the policies and procedures of the College and applicable governing agencies;
4. Train, supervise and evaluate employees in accordance with negotiated agreements, applicable state and federal laws, and College policies and procedures; and
5. Work to achieve and support affirmative action goals as established by the College.

D BUDGET
RESPONSIBILITY

Human Resources, Legal Affairs and HR College Support

E COMPETENCIES

- Organizational Strategy – Demonstrated experience aligning and expanding programs based on the organization's mission, structures, and resources.
- Communication – Demonstrated experience creating and maintaining open communications regarding resources, priorities, and expectations. Effective problem-solving skills as well as strong oral and written communication skills.
- Collaboration – Demonstrated experience building and leveraging networks and partnerships to advance the mission, vision, and goals of an institution.
- Budget Management – Demonstrated experience developing and administering operating budgets, preparing financial reports, and ensuring compliance with federal and state regulations.
- Project Management – Demonstrated experience initiating, implementing, and coordinating multiple projects and priorities while meeting timelines.
- Personnel Management – Strong and effective interpersonal skills working with faculty and administration to ensure compliance with state and local policies and procedures.
- Professionalism – Demonstrated courage to take risks, make difficult decisions, and accept responsibility.
- Advocacy – Demonstrated experience working with staff and

student of great diversity in socioeconomic, cultural, and ethnic background, including those with different levels of academic preparation and varying physical and learning abilities.

F QUALIFICATIONS

- Juris Doctorate degree and five (5) years of progressively responsible leadership in the areas of human resources administration, human resources development, policy and program development, labor and employee/faculty relations, benefits, classification collective bargaining, ADA and FMLA requirements, affirmative action strategic human resource planning and supporting a diverse workforce.

Preferred/Desired Education

- Mastery of human resources policies, procedures and regulatory requirements;
- Knowledge of labor relations law and practices, and experience with collective bargaining, contract negotiation and contract administration;
- Strong leadership and coaching skills;
- The ability to balance strategic focus with operational perspective (articulate vision, execute strategic initiatives, and manage the operations of College HR team);
- Excellent communication skills; written, verbal, presentation, and interpersonal;
- The ability to manage a multicultural workforce;
- Experience in public and/or academic environments;
- Familiarity with academic, community college or university institutions.

Special Requirements/Conditions of Employment

- Washington State Bar License

**G PHYSICAL
REQUIREMENTS**

- Occasional need to lift at least 20 pounds;
- Ability to sit and stand for long periods of time;
- Frequent need for oral, written and auditory communication;
- Frequent repetitive hand and wrist motions;
- Occasional need for travel;
- Ability to work in fast paced and sometimes stressful services environment.

**H WORKING
CONDITIONS**

Work week is Monday – Friday, 7:30 a.m. – 4:30 p.m. however working hours will vary due to work demands and changes in the College’s schedule. Some evening and weekend work is to be expected.

JOB DESCRIPTION

Employee Name:	
Job Title:	Outreach/Retention Specialist for the Bachelors of Science in Cyber Security Program
Reports to:	Associate Dean for Student Retention & Completion
Exempt/FLSA	Yes
Prepared Date:	April 8, 2016
Approved Date:	April 8, 2016 (newly assigned supervisor)

A POSITION OBJECTIVES

The Outreach and Retention Specialist for the Bachelors of Applied Science (BAS) in Cyber Security Program will develop and then implement a recruiting and retention plan to include strategies to attract a diverse pool of student candidates, coordinate and provide assistance to enrolled students, and monitor student progress toward completion. The Outreach and Retention Specialist will report to the Associate Dean for Student Retention & Completion.

B SUPERVISORY RESPONSIBILITIES

N/A

C ESSENTIAL FUNCTIONS –DUTIES AND RESPONSIBILITIES

- Assist the Dean and other Columbia Basin College faculty and staff in implementing the Cyber Security Bachelor Program goals and objectives;
- Develop strategies to recruit, enroll, retain and graduate students in Bachelor Program and collaborate with existing College departments such as Outreach and Student Success & Engagement in these efforts;
- Collaborate with other campus BAS program staff to support shared marketing, outreach, recruitment, and retention processes and advising programs;
- Assist in the oversight of the Program application process, student handbook, and recruiting materials in both printed and electronic formats;
- Conduct informational sessions on the Program in the community, the College and organizational settings and ensure effective handling of inquiries concerning prerequisites, curriculum, enrollment procedures, transferability of previous coursework, and/or College services from prospective students online, by phone, at events, or in-person;
- Develop and implement an orientation, as well as other student activities/offerings to support and retain students;
- Implement tutoring and other support offerings to assist the special needs of the Bachelor adult-student population;
- Coordinate with Student Services to ensure Cyber Security students receive services and resources to support their continued enrollment as well as specialized services germane to the Program;

- Develop and implement an advising model that assists students in designing and revising educational plans, as necessary, to meet their individual goals;
- Monitor student academic progress and implement student success workshops or other support offerings to maximize cohort retention;
- Recommend BAS in Cyber Security courses and other general education course scheduling;
- Collaborate with Instructional Support to support faculty efforts in utilizing appropriate eLearning technology, establishing Bachelor Program smart classrooms, and supporting faculty efforts to utilize appropriate eLearning technology;
- Maintain accurate records for reporting purposes, assessment activities and ensure accurate student coding;
- Provide other support as needed to the Dean for activities such as assessment, curriculum development, and accreditation; and
- Other duties as assigned.

D BUDGET
RESPONSIBILITY

None

E COMPETENCIES

Project Management: Develop project plans; coordinate projects; communicate change and progress; complete projects on time and budget; and manage project team activities.

Teamwork: Balance team and individual responsibilities; exhibit objectivity and openness to other views; give and welcome feedback; contribute to building a positive team spirit; put success of team above own interest; able to build morale and group commitment to goals and objectives; and support everyone's effort to succeed.

Visionary Leadership: Display passion and optimism; inspire respect and trust; mobilize others to fulfill the vision; and provide vision and inspiration to peers and subordinates.

Change Management: Develop workable implementation plans; communicate changes effectively; build commitment and overcome resistance; prepare and support those affected by change; and monitor transition and evaluate results.

Leadership: Exhibit confidence in self and others; inspire and motivate others to perform well; can effectively influence the actions and opinions of others; accept feedback from others; and give appropriate recognition to others.

Quality Management: Look for ways to improve and promote quality; and demonstrate accuracy and thoroughness.

Business Acumen: Understand business implications of decision; display orientation to profitability; demonstrate knowledge of market and competition; and align work with strategic goals.

Cost Consciousness: Work within approved budget; develop and implement cost savings measures; contribute to profits and revenues; conserve organizational resources.

F REQUIRED
QUALIFICATIONS

- Bachelor's degree in computer science, education, communications, student development, business administration or related field from an accredited college or university;
- Experience in student recruitment and advising in a college setting;
- Proficient in Microsoft Office; and
- Commitment to diversity and cultural sensitivity with experience in working with diverse populations.

Preferred Qualifications:

- Master's degree in computer science, education, communications, student development, business administration or related field;
- Knowledge and understanding of computer science education;
- Experience in advising, retention and other student support services in a college setting;
- Knowledge about current best practices and research findings relative to student retention programs and services; and
- Instructional experience in a college setting.

G PHYSICAL
REQUIREMENTS

- Occasional need to lift at least 20 pounds;
- Ability to sit and stand for long periods of time;
- Frequent need for oral, written and auditory communication;
- Frequent repetitive hand and wrist motions;
- Occasional need for travel;
- Ability to work in fast paced and sometimes stressful services environment.

H WORKING
CONDITIONS

Work week is Monday – Thursday, 7:00 a.m. – 4:30 p.m. and Friday 7:00 a.m. - Noon; however working hours may vary due to work demands and some evening and weekend work is expected and will be required.